

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

**910 E MAIN LLC D/B/A QUARTER
TAVERN; BUBBA'S SALOON, LLC;
CJD III LLC D/B/A TWISTED TAVERN;
DOUG MCCARTHY ENTERPRISES INC.
D/B/A 501; EMERALD BILLIARDS, L.L.C.;
MULLIGAN'S ON THE TECHE, L.L.C.
D/B/A CANTINA'S DOWNTOWN; MY
PLACE BAR & GRILL, L.L.C.;
NAPOLEONS ON THE TECHE, LLC; POOL
DO'S SPORTS BAR LLP; SOCO SPORTS
BAR, LLC; YED ENTERPRISES LLC D/B/A
DEWEY'S LOUNGE**

CIVIL ACTION NO. _____

DISTRICT JUDGE _____

MAGISTRATE JUDGE _____

JURY DEMAND

VERSUS

**JOHN BEL EDWARDS,
IN HIS OFFICIAL CAPACITY
AS GOVERNOR OF THE STATE OF
LOUISIANA; AND H. "BUTCH"
BROWNING, JR., IN HIS OFFICIAL
CAPACITY AS FIRE MARSHAL OF
THE STATE OF LOUISIANA**

EXHIBIT A

DECLARATION OF PLAINTIFF 910 E MAIN 33, LLC D/B/A QUARTER TAVERN

Ty Boudoin, as owner of 910 E Main 33, LLC d/b/a Quarter Tavern, declares and states as follows:

1. I have personal knowledge of the factual matters alleged in Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief because I own 910 E Main 33, LLC d/b/a Quarter Tavern identified in the Complaint.
2. I have reviewed Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. 910 E Main 33, LLC d/b/a Quarter Tavern is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control ("LATC").
4. 910 E Main 33, LLC d/b/a Quarter Tavern was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards' Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards' Stay at Home Order, 910 E Main 33, LLC d/b/a Quarter Tavern closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, 910 E Main 33, LLC d/b/a Quarter Tavern reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards' Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, 910 E Main 33, LLC d/b/a Quarter Tavern closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.

8. If allowed to remain open during Phase 2, 910 E Main 33, LLC d/b/a Quarter Tavern could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ____ day of July, 2020.



Ty Boudoin

Owner of 910 E Main 33, LLC d/b/a Quarter Tavern
Named Plaintiff

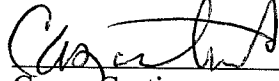
DECLARATION OF PLAINTIFF BUBBA'S SALOON, LLC

Casey Curtis and Thomas Bourque, as owners of Bubba's Saloon, LLC, declare and state as follows:

1. We have personal knowledge of the factual matters alleged in Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief because we own Bubba's Saloon, LLC identified in the Complaint.
2. We have reviewed Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. Bubba's Saloon, LLC is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control ("LATC").
4. Bubba's Saloon, LLC was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards' Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards' Stay at Home Order, Bubba's Saloon, LLC closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, Bubba's Saloon, LLC reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards' Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, Bubba's Saloon, LLC closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.
8. If allowed to remain open during Phase 2, Bubba's Saloon, LLC could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this _____ day of July, 2020.

A handwritten signature in black ink, appearing to read 'Casey Curtis', written over a horizontal line.

Casey Curtis
Thomas Bourque
Named Plaintiff

DECLARATION OF PLAINTIFF TWISTED TAVERN

Cursey J. Douget III, as owner of CJD III LLC d/b/a Twisted Tavern (“Twisted Tavern”), declares and states as follows:

1. I have personal knowledge of the factual matters alleged in Plaintiffs’ Complaint for Declaratory Judgment and Injunctive Relief because I own Twisted Tavern identified in the Complaint.
2. I have reviewed Plaintiffs’ Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. Twisted Tavern is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control (“LATC”).
4. Twisted Tavern was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards’ Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards’ Stay at Home Order, Twisted Tavern closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, Twisted Tavern reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards’ Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, Twisted Tavern closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.
8. If allowed to remain open during Phase 2, Twisted Tavern could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of July, 2020.

/s/ Cursey J. Douget III
Cursey J. Douget III
CJD III LLC d/b/a Twisted Tavern
Named Plaintiff

DECLARATION OF PLAINTIFF DOUG MCCARTHY ENTERPRISES INC. D/B/A 501

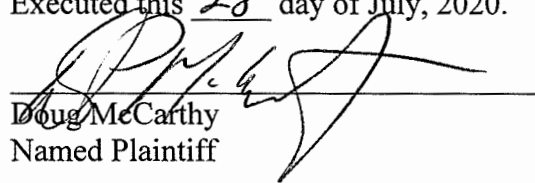
Doug McCarthy, as owners of Doug McCarthy Enterprises Inc. d/b/a “501”, declares and states as follows:

1. I have personal knowledge of the factual matters alleged in Plaintiffs’ Complaint for Declaratory Judgment and Injunctive Relief because I own Doug McCarthy Enterprises Inc. d/b/a “501” identified in the Complaint.
2. I have reviewed Plaintiffs’ Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. Doug McCarthy Enterprises Inc. d/b/a “501” is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control (“LATC”).
4. Doug McCarthy Enterprises Inc. d/b/a “501” was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards’ Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards’ Stay at Home Order, Doug McCarthy Enterprises Inc. d/b/a “501” closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, Doug McCarthy Enterprises Inc. d/b/a “501” reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards’ Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, Doug McCarthy Enterprises Inc. d/b/a “501” closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.

8. If allowed to remain open during Phase 2, Doug McCarthy Enterprises Inc. d/b/a “501” could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28 day of July, 2020.



Doug McCarthy
Named Plaintiff

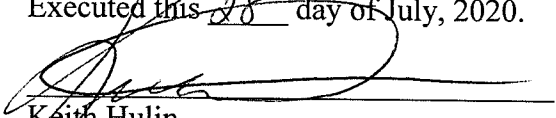
DECLARATION OF PLAINTIFF EMERALD BILLIARDS, LLC

Keith Hulin, as owner of Emerald Billiards, LLC, declares and states as follows:

1. I have personal knowledge of the factual matters alleged in Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief because I own Emerald Billiards, LLC identified in the Complaint.
2. I have reviewed Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. Emerald Billiards, LLC is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control ("LATC").
4. Emerald Billiards, LLC was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards' Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards' Stay at Home Order, Emerald Billiards, LLC closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, Emerald Billiards, LLC reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards' Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, Emerald Billiards, LLC closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.
8. If allowed to remain open during Phase 2, Emerald Billiards, LLC could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28 day of July, 2020.



Keith Hulin
Named Plaintiff

DECLARATION OF PLAINTIFF MULLIGAN'S ON TECHE, LLC
D/B/A CANTINA'S DOWNTOWN

Jonathon Gibson and Thomas Bourque, as owners of Mulligan's on Teche, LLC d/b/a Cantina's Downtown, declares and states as follows:

1. We have personal knowledge of the factual matters alleged in Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief because we own Mulligan's on Teche, LLC d/b/a Cantina's Downtown identified in the Complaint.
2. We have reviewed Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. Mulligan's on Teche, LLC d/b/a Cantina's Downtown is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control ("LATC").
4. Mulligan's on Teche, LLC d/b/a Cantina's Downtown was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards' Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards' Stay at Home Order, Mulligan's on Teche, LLC d/b/a Cantina's Downtown closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, Mulligan's on Teche, LLC d/b/a Cantina's Downtown reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards' Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, Mulligan's on Teche, LLC d/b/a

Cantina's Downtown closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.

8. If allowed to remain open during Phase 2, Mulligan's on Teche, LLC d/b/a Cantina's Downtown could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ____ day of July, 2020.

A handwritten signature in black ink, appearing to read 'Jonathon Gibson', written over a horizontal line.

Jonathon Gibson
Thomas Bourque
Named Plaintiff


DECLARATION OF PLAINTIFF MY PLACE BAR & GRILL, L.L.C.

Tanya Abshire, as owner of My Place Bar & Grill, L.L.C., declares and states as follows:

1. I have personal knowledge of the factual matters alleged in Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief because I own My Place Bar & Grill, L.L.C. identified in the Complaint.
2. I have reviewed Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. My Place Bar & Grill, L.L.C. is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control ("LATC").
4. My Place Bar & Grill, L.L.C. was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards' Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards' Stay at Home Order, My Place Bar & Grill, LLC closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, My Place Bar & Grill, LLC reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards' Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, My Place Bar & Grill, LLC closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.
8. If allowed to remain open during Phase 2, My Place Bar & Grill, LLC could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22 day of July, 2020.



Tanya Abshire
Named Plaintiff

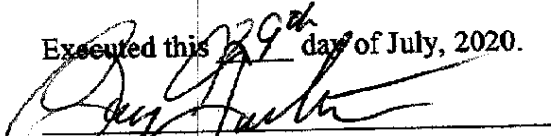
DECLARATION OF PLAINTIFF NAPOLEONS ON THE TECHE, LLC

Barry Guillotte, as owner of Napoleons on the Teche, LLC, declares and states as follows:

1. I have personal knowledge of the factual matters alleged in Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief because I own Napoleons on the Teche, LLC identified in the Complaint.
2. I have reviewed Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. Napoleons on the Teche, LLC is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control ("LATC").
4. Napoleons on the Teche, LLC was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards' Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards' Stay at Home Order, Napoleons on the Teche, LLC closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, Napoleons on the Teche, LLC reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards' Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, Napoleons on the Teche, LLC closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.
8. If allowed to remain open during Phase 2, Napoleons on the Teche, LLC could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of July, 2020.


Barry Guillotte
Named Plaintiff



DECLARATION OF PLAINTIFF POOL DO'S SPORTS BAR LLP

Jason Romeo and Jules Roussell, as owners of Pool Do's Sports Bar LLP, declare and state as follows:

1. We have personal knowledge of the factual matters alleged in Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief because we own Pool Do's Sports Bar LLP identified in the Complaint.
2. We have reviewed Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. Pool Do's Sports Bar LLP is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control ("LATC").
4. Pool Do's Sports Bar LLP was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards' Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards' Stay at Home Order, Pool Do's Sports Bar LLP closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, Pool Do's Sports Bar LLP reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards' Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, Pool Do's Sports Bar LLP closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.
8. If allowed to remain open during Phase 2, Pool Do's Sports Bar LLP could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this _____ day of July, 2020.



Jason Romeo
Jules Roussell
Named Plaintiff

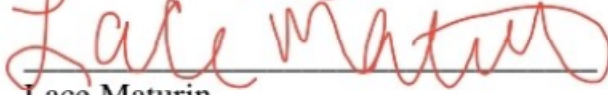
DECLARATION OF PLAINTIFF SOCO SPORTS BAR, LLC

Lace Maturin, as owner of SoCo Sports Bar, LLC, declares and states as follows:

1. I have personal knowledge of the factual matters alleged in Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief because I own SoCo Sports Bar, LLC identified in the Complaint.
2. I have reviewed Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. SoCo Sports Bar, LLC is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control ("LATC").
4. SoCo Sports Bar, LLC was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards' Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards' Stay at Home Order, SoCo Sports Bar, LLC closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, SoCo Sports Bar, LLC reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards' Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, SoCo Sports Bar, LLC closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.
8. If allowed to remain open during Phase 2, SoCo Sports Bar, LLC could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28 day of July, 2020.

A handwritten signature in red ink, appearing to read "Lace Maturin", is written over a horizontal line.

Lace Maturin
Named Plaintiff

DECLARATION OF PLAINTIFF YED ENTERPRISES, LLC (DEWEY'S LOUNGE)

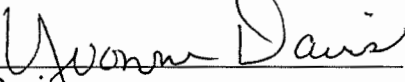
Yvonne Davis, as owners of YED Enterprises, LLC (Dewey's Lounge), declares and states as follows:

1. I have personal knowledge of the factual matters alleged in Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief because I own YED Enterprises, LLC (Dewey's Lounge) identified in the Complaint.
2. I have reviewed Plaintiffs' Complaint for Declaratory Judgment and Injunctive Relief and Exhibits, and all factual allegations contained in the Complaint are true and accurate.
3. YED Enterprises, LLC (Dewey's Lounge) is a fully licensed bar as defined by the Louisiana Office of Alcohol and Tobacco Control ("LATC").
4. YED Enterprises, LLC (Dewey's Lounge) was a lawfully existing business and Class AG Permit Holder, as defined by LATC, prior to Governor John Bel Edwards' Stay at Home Order issued on March 22, 2020 (33 JBE 2020).
5. In compliance with Governor Edwards' Stay at Home Order, YED Enterprises, LLC (Dewey's Lounge) closed by 5:00 p.m. on Monday, March 23, 2020 and remained closed until the Governor issued 74 JBE 2020, moving Louisiana into Phase 2 on Friday, June 5, 2020.
6. During Phase 2, YED Enterprises, LLC (Dewey's Lounge) reopened at diminished capacity as set forth in 74 JBE 2020 and implemented social distancing measures.
7. As a result of Governor John Bel Edwards' Proclamation Nos. 89 JBE 2020 and 96 JBE 2020 and the enforcement of such order by Defendants, YED Enterprises, LLC (Dewey's Lounge) closed for on-premises consumption of drinks and/or food after Sunday, July 12, 2020.

8. If allowed to remain open during Phase 2, YED Enterprises, LLC (Dewey's Lounge) could implement additional precautions and social distancing measures.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28 day of July, 2020.



Yvonne Davis
Named Plaintiff